U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF RESPONSE & RESTORATION
COASTAL PROTECTION & RESTORATION DIVISION
c/o California Department of Toxic Substance Control,
Human and Ecological Risk Division
8800 Cal Center Drive
Sacramento, CA 95826

Sent via US Mail and FAX

May 26, 2006

Mr. Craig Hunt
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard
Santa Rosa, California 95403

Dear Mr. Hunt,

The National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on the Draft Human Health and Ecological Risk Assessment Work Plan for the Georgia-Pacific California Wood Products Manufacturing Facility, Fort Bragg, California. This work plan was prepared for Georgia-Pacific Corporation, Atlanta, Georgia by Tetra Tech Inc., and was submitted in January 2006.

On behalf of NOAA, the Coastal Protection and Restoration Division (CPRD), is commenting on this work plan as a Natural Resource Trustee under authorities contained in the National Contingency Plan (NCP) §300.600, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). NOAA is a co-trustee for natural resources with the United States Department of the Interior, and the State of California where there are coexisting or contiguous natural resources or concurrent jurisdictions (NCP §300.615).

Pursuant to the NCP, NOAA's designated trust resources include:

- All life stages of coastal fishery resources and migratory fish species throughout their ranges, including rivers, lakes and streams which historically or presently support these species;
- Marine mammals, and federally endangered and threatened species under NOAA's responsibility, including designated critical habitat for those species;
- Tidal wetlands, salt marshes, estuaries, and other important habitats supporting coastal resources; and
- All resources within the boundaries of the National Marine Sanctuaries and National Estuarine Reserves.

Comments

Habitat and Site Related Releases

The work plan identifies five types of environmentally sensitive habitats present at the Georgia-Pacific site. One of these habitat types is described as "Coastal bluffs, Coastal waters, and Intertidal/Marine". According to text in the work plan, the marine coastal habitat is present for approximately 3 miles along the western edge of the site.

The site description in the document goes further to identify an area along the shoreline known as Soldier Bay. Soldier Bay terminates at a sandy beach, and the dam and overflow structure from Pond 8 are along the southern edge of the beach. The overflow from Pond 8, also known as the Log Pond, discharges into the near-shore marine environment along the southern edge of the beach. The Log Pond also received scrubber effluent from the Powerhouse and storm water from the city of Fort Bragg. There are also four storm water drainpipes which terminate at the beach and according to the work plan appear to drain the sawmill area. In 2003, the work plan states that at least two of these drainpipes were observed discharging to the beach during rain events.

Despite the presence of this significant sensitive habitat at the Georgia-Pacific site, and identified releases to the marine environment, there is no documentation that an investigation of site-related releases to this habitat has been conducted, nor is there any proposal in this work plan to conduct an ecological risk assessment in this area.

Contaminants of Potential Ecological Concern

Some of the contaminants of concern identified at the site include polychlorinated biphenyls (PBCs), pesticides, semi-volatile organic compounds, polycyclic aromatic hydrocarbons, dioxins/furans, and metals. These contaminants, if released into the marine environment, can be harmful to marine or marine-dependent receptors. Many of these contaminants will bioaccumulate in receptors exposed to the contamination, and some of these contaminants will biomagnify in the food chain. Releases of these contaminants into the marine environment have the potential to impact human consumers of marine biota if the biota has been exposed to the contamination. Given that these contaminants have been released to site soils, surface water, and groundwater, and both surface water and groundwater have been, and may still be moving into the marine environment, a pathway exists for contamination to reach marine receptors. This pathway should be examined through a site/remedial investigation, and if the pathway is complete, an ecological risk assessment should be conducted.

Conclusion

Based on the descriptions in the work plan, there is a strong potential that ecological risk resulting from releases from the Georgia-Pacific site may be present in the marine environment. The work plan cites the following: 1) a history of movement of water around the site that is associated with the industrial activities; 2) a documented history of releases to the marine environment; 3) contaminants of potential concern that may impact ecological receptors; and 4) the presence of marine mammals and other marine and marine-dependent receptors in the near-shore environment. The only way to determine if any one of these risk component pathways is not complete is to conduct an evaluation as part of the site investigation. NOAA is requesting that the site investigation include an evaluation of releases to the marine environment, including an evaluation of the potential for risk to NOAA trust resources that may have occurred as a result of releases from the site.

NOAA appreciates the opportunity to provide comments to you as a Natural Resource Trustee for marine and estuarine resources. As a Natural Resource Trustee for marine and estuarine resources under CERCLA, NOAA is concerned about the loss or injury to coastal resources and the services those resources provide to wildlife and the public. As part of the trust responsibility, NOAA seeks, on behalf of the public, to restore resources that have been injured by releases of contamination to the marine environment. NOAA would like to reiterate the importance of evaluating potential releases of contaminants into the marine environment from the Georgia-Pacific site. Contaminants released into the marine environment from past and potentially current site activities may impact not only the benthic community which forms the basis of the food chain, but may impact other coastal resources such as marine invertebrates, marine mammals, fish, and avian receptors. Potential losses or impairment of these biological resources in turn has the potential to impact human uses and the benefits provided by this coastal environment.

NOAA looks forward to working with you, other Natural Resource Trustees, and Georgia-Pacific to evaluate the risk to trust resources from releases associated with the site and to establish cleanup concentrations that will protect and restore any impacted natural resources. Please feel free to contact me at (916) 255-6686 to discuss any questions that you may have regarding on these comments.

Sincerely,

Denise M. Klimas
NOAA Coastal Resources Coordinator
Office of Response and Restoration

Cc: Carol Stevens, Georgia Pacific
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